

From: Blanco-Gonzalez, Joel
Sent: Wednesday, May 28, 2014 2:56 PM
To: 'Patel, Jay (DEP)'
Subject: Draft Permit Comments - PPL Brunner Island LLC - PA0008281

Jay,

Re-Draft Permit: PPL Brunner Island LLC
NPDES ID: PA0008281
EPA Received: May 14, 2015
EPA Commented: April 12, 2012

Based on our preliminary review of the draft permit and fact sheet, we are sharing some concerns. Based on your availability, I will call you tomorrow by 10:00 am to discuss this and any other concern regarding this matter.

Outfall 005 – Our records show that this facility does have Combustion Residuals (CCRs) Impoundments. CCRs often contain comingled wastes such as, but not limited to, fly ash, bottom ash, cooling tower blowdown, metal cleaning wastes, coal pile runoff, and low volume waste (including treated or untreated FGD wastewater, and leachate from the ponds/impoundments and landfills that receive combustion residues). The following pollutants may be expected to be found in CCR effluent at concentrations causing, having the reasonable potential to cause, or contributing to an excursion above any effluent limitation guidelines and/or State water quality standards, including State narrative criteria for water quality: Total Suspended Solids (TSS); Oil and Grease (O&G); Aluminum; Arsenic; Cadmium; Chromium; Copper; Iron; Manganese; Nickel; Selenium; Thallium; Chloride; Nitrate/Nitrite; Barium; Lead; Mercury; Silver; Sulfate, and; Total Dissolved Solid (TDS).

The fact sheet describes some, but not all, the pollutants listed above. For instance, Outfall 005 does not clearly describe the following pollutants: Thallium; Chloride; Nitrate/Nitrite; Barium; Silver; Sulfate, and; Total Dissolved Solid (TDS), in accordance with the WQBEL Coal Combustion Waste Impoundments guidance.

As a recommendation, DEP should incorporate, at a minimum, appropriate monitoring and reporting requirements as set forth in 40 CFR §§ 122.44(i) and 122.41(l)(4) for the pollutants listed above which are expected to present in the effluent, and/or include a justification in the fact sheet regarding DEP's best professional judgment and determination on all effluent limitations and monitoring requirements imposed in the draft permit, in accordance with federal regulations

If you have any questions concerning this matter, please let me know.

Thanks

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NPDES Permits Branch (3WP41)
Office of Permits and Enforcement

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